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August 28, 2015

Honorable George B. Daniels  
U.S. District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
Room 1310  
500 Pearl Street  
New York, NY 10007-1312

**Re: Sokolow v. Palestine Liberation Organization, et al., No. 1:04-cv-0397 (GBD);  
Plaintiffs' Letter and Proposed Judgment of August 27, 2015**

Dear Judge Daniels,

On behalf of the Palestinian Authority (“PA”) and Palestine Liberation Organization (“PLO”), we respectfully request that Defendants have until September 1, 2015 to respond substantively to the August 27, 2015 letter and alternative proposed form of Judgment (Dkt. #960) submitted by Plaintiffs’ counsel, Mr. Yalowitz.

Plaintiffs did not provide advance notice to us of that letter, contrary to the Court’s 24-hour notice rule. *See* Tr. (7/28/15) at 12:19-13:6. Our anticipated September 1 response date is well within the 14-day period that the Court established for the parties to comment on the Court’s August 24, 2015 form of Judgment. *See* Tr. (8/24/15) at 32:11-19. Beyond providing the PA’s and PLO’s comments on both the Court’s and Plaintiffs’ forms of the Judgment, our response will address: (i) Plaintiffs’ request to reconsider the timing of entry of Judgment provided in the Court’s August 24, 2015 Rule 62 Order (Dkt. #957) (“Rule 62 Order”); (ii) the scope of the Court’s continuing jurisdiction over Rule 62 issues in light of Plaintiffs’ Notice of Appeal (Dkt. #961) from the Rule 62 Order; and (iii) Plaintiffs’ unilateral “reserv[ation]” of a purported “right to pursue post-judgment discovery” (Dkt. #960, at 2) contrary to the Court’s express “stay [of] any active discovery with regard to assets” absent some showing of an alleged “fraudulent transfer” (Tr. (8/24/15) at 18:13-19, 18:24-19:5), to which Plaintiffs consented (*id.* at 18:20-24).

Respectfully submitted,

A handwritten signature in black ink, appearing to read "G. A. Baloul".

Gassan A. Baloul

cc: All Counsel

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